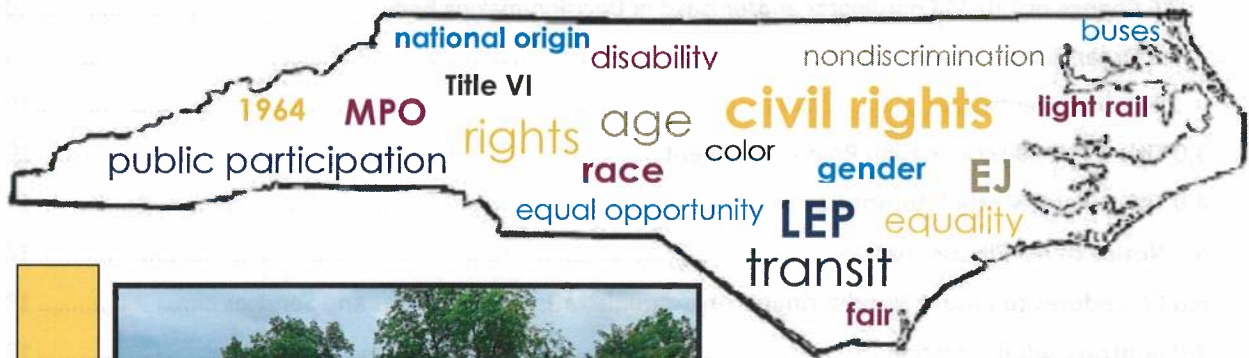


Moore County Transportation Services



Date Adopted
11/01/2022

Title VI Program Plan



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TITLE VI NONDISCRIMINATION AGREEMENT
BETWEEN
THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION
AND
COUNTY OF MOORE/MOORE COUNTY TRANSPORTATION SERVICES

In accordance with DOT Order 1050.2A, the County of Moore/Moore County Transportation Services assures the North Carolina Department of Transportation (NCDOT) that no person shall, on the ground of **race, color, national origin, sex, creed (religion), age, or disability**, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and related nondiscrimination authorities, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the County of Moore/Moore County Transportation Services.

Further, the County of Moore/Moore County Transportation Services hereby agrees to:

1. Designate a Title VI Coordinator that has a responsible position within the organization and easy access to the Chairman of the Board of Commissioners of the organization.
2. Issue a policy statement, signed by the Chairman of the Board of Commissioners of the organization, which expresses a commitment to the nondiscrimination provisions of Title VI and related applicable statutes. The signed policy statement shall be posted and circulated throughout the organization and to the general public, and published where appropriate in languages other than English. The policy statement will be re-signed when there is a change of Chairman of the Board of Commissioners.
3. Insert the clauses of the contract language from Section 6.1 in every contract awarded by the organization. Ensure that every contract awarded by the organization's contractors or consultants also includes the contract language.
4. Process all and, when required, investigate complaints of discrimination consistent with the procedures contained within this Plan. Log all complaints for the administrative record.
5. Collect statistical data (race, color, national origin, sex, age, disability) on participants in, and beneficiaries of, programs and activities carried out by the organization.
6. Participate in training offered on Title VI and other nondiscrimination requirements. Conduct or request training for employees or the organization's subrecipients.
7. Take affirmative action, if reviewed or investigated by NCDOT, to correct any deficiencies found within a reasonable time period, not to exceed 90 calendar days, unless reasonable provisions are granted by NCDOT.
8. Document all Title VI nondiscrimination-related activities as evidence of compliance. Submit information and reports to NCDOT on a schedule outlined by NCDOT.

THIS AGREEMENT is given in consideration of, and for the purpose of obtaining, any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding.

11-1-22

Authorized Signature



Date

Frank Quis
Board of Commissioners Chair

1.0 INTRODUCTION

Title VI of the 1964 Civil Rights Act, 42 U.S.C. 2000d provides that: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The broader application of nondiscrimination law is found in other statutes, executive orders, and regulations, which provide additional protections based on age, sex, creed, and disability, including the 1987 Civil Rights Restoration Act, which extended nondiscrimination coverage to all programs and activities of federal-aid recipients, subrecipients, and contractors, including those that are not federally-funded (see Appendix A – Applicable Nondiscrimination Authorities).

Moore County Transportation Services is a recipient of Federal financial assistance from the North Carolina Department of Transportation (NCDOT) and the United States Department of Transportation (USDOT), receiving Federal Transit Administration (FTA) funds through the NCDOT. As the primary recipient of USDOT funds in North Carolina, the NCDOT's comprehensive Title VI Nondiscrimination Program includes compliance oversight and technical assistance responsibilities towards its subrecipients and those subrecipients must use federal and state funds in a nondiscriminatory manner.

Moore County Transportation Services establishes this Title VI Nondiscrimination Plan for the purpose of complying with Title VI of the Civil Rights Act of 1964, as required by FTA Circular 4702.1B, and related requirements outlined under Group 01.D, "Nondiscrimination Assurance," of the FTA Certifications and Assurances. This document details the nondiscrimination program, policies, and practices administered by this organization, and will be updated periodically to incorporate changes and additional responsibilities as they are made.

2.0 DESCRIPTION OF PROGRAMS AND SERVICES

2.1 PROGRAMS AND SERVICES ADMINISTERED

All Moore County Transportation Services are non-emergency and provide the following types of transportation to all Moore County residents:

- Subscription - when passengers schedule routine rides from one specific location to another location and at set times (e.g. Transportation to work on Monday, Wednesday, and Friday mornings).
- Demand response - when passengers request a single ride from one specific location to another specific location at a set time.
- Deviated fixed route - a fixed route with minor deviations for pick-ups and drop-offs (A-Pines Line).

Requests for service must be scheduled at least two business days in advance. Passengers are permitted two one-way trips per day with exception of the deviated fixed route service.

Driver service hours are Monday through Friday, between the hours of 3:30 am and 6:30 pm. Subscription appointment services are provided Monday through Friday between the hours of 5:00 am and 5:00 pm. All demand response appointment services are provided Monday through Friday between the hours of 8:00 am and 3:00 pm for in-county trips and between the hours of 9:00 am and 11:00 am for out of county trips. Office hours are between the hours of 7:30 am and 6:00 pm.

When in operation, the deviated fixed route, the "A-Pines" Line, operates between the hours of 7:00 am and 5:30 pm, Monday through Friday. The route will deviate for clients located within a one-mile radius from the designated stops.

A. HOLIDAYS

Moore County Transportation Services is closed on holidays observed by the County of Moore. These designated holidays include:

- New Year's Day
- Martin Luther King Jr. Day
- Easter Friday
- Memorial Day
- Fourth of July
- Labor Day
- Veterans Day

- Thanksgiving
- Friday after Thanksgiving Day
- Christmas (see schedule below)

When a holiday other than Christmas is on a Saturday, the preceding Friday shall be observed as a holiday. When a holiday other than Christmas is on a Sunday, the following Monday shall be observed as a holiday.

The County observes the following schedule regarding Christmas Day. When Christmas Day falls on the days noted in the table below, then the following days are observed as vacation:

Sunday	Friday, Monday and Tuesday
Monday	Monday, Tuesday and Wednesday
Tuesday	Monday, Tuesday and Wednesday
Wednesday	Tuesday, Wednesday and Thursday
Thursday	Wednesday, Thursday and Friday
Friday	Thursday, Friday and Saturday
Saturday	Thursday, Friday and Saturday

B. OUT-OF-COUNTY SCHEDULE

Out-of-County appointments must be made between the hours of 9:00 am and 11:00 am only.

The Moore County Transportation Services Out-Of-County schedule is as follows:

Day	Area
Monday	Biscoe, Fayetteville, Raeford, Sanford, and Troy
Tuesday	No out of County trips
Wednesday	Sanford
Thursday	Chapel Hill, Durham, and Raleigh
Friday	No out of County trips

MCTS vans are required to depart by 3:00 pm from Chapel Hill/Durham and Fayetteville area(s).

C. NON-EMERGENCY OR MEDICAL RELATED TRIPS

All transportation services provided by MCTS are non-emergency. Passengers scheduled for appointments will not be transported by MCTS if any of the following symptoms are evident:

- Chest pains
- Shortness of breath
- Severe nausea
- Vomiting or diarrhea
- Abdominal pain
- Labor pain

If the MCTS driver finds the passenger in distress upon arrival, the driver will recommend the passenger be transported to the hospital by Emergency Medical Services (EMS).

If a passenger becomes ill during transport, the driver will call 911. The driver, in their discretion, will either drive directly to the nearest hospital emergency room or stop and wait for EMS to arrive.

The sponsoring agency will be responsible for ensuring that patients/clients are able to be transported by MCTS when discharged from a facility outside of Moore County. Compliance with this requirement is the responsibility of the sponsoring agency.

D. ROAP (RURAL OPERATING ASSISTANCE PROGRAM) USER FEES

Moore County Transportation Services provides transportation to Medical, Employment, and Education related trips for Moore County citizens with a small fee.

- In County Trips = \$4 dollars each way
- Out of County Trips to Biscoe, Fayetteville, Raeford, Sanford and Troy = \$7 dollars each way**
- Out of County Trips to Chapel Hill, Durham, and Raleigh = \$10 dollars each way**

**Trips only provided on select weekdays. Please refer to policy and procedures for designated times.

E. RESERVATIONS

MCTS must be notified of scheduled appointments no later than two business days before an appointment.

Appointment Day	Must call by 5:00 pm on this day to schedule:
Monday	Wednesday
Tuesday	Thursday
Wednesday	Friday
Thursday	Monday
Friday	Tuesday

Requests for service can only be met if all the following conditions are met:

- Moore County Transportation has available resources to meet the need.
- Space is available on an existing route.
- An efficient cost and effective route can be developed.

It is the passenger's or agencies responsibility to know and furnish MCTS with the doctor's name and the medical building (physical address) to where they are being transported.

Drivers are not permitted to sign passengers in or out of scheduled appointments.

All MCTS passengers will be ready approximately one and a half (1.5) hours prior to their scheduled appointment time.

Demand Response appointments must be scheduled between 8:00am and 3:00 pm for in-county trips and between 9:00 am and 11:00 am for out of county trips.

Drivers wait five (5) minutes for passengers, if the client does not board the vehicle within 5 the passenger will be marked as a NO SHOW unless otherwise instructed by MCTS office.

Passengers should wait at a main entrance or curbside if they are physically or mentally capable and weather permitting.

EXCEPTION: While transportation services are required to be scheduled no less than two business days in advance, if an organization within Moore County, which has not entered into a contract with the County for transportation services, experiences extenuating circumstances, the Director of MCTS or his/her designee, in his/her sole discretion, may approve transportation services to clients of that organization within two business days. In such an event, MCTS will inform the requesting organization of the following:

1. The request must be approved by the Director of MCTS or their designee;
2. If approved, the requested services will be added to the schedule; however, to the extent possible, the assistance will not interfere with the scheduled operations of MCTS;
3. The organization will identify its clients to be transported, the locations for transportation services to be provided, preferred pick up times, and whether an aide/escort will be accompanying any of the clients. (See Section 8, Passenger Aide/Escort).

4. All trips are limited to in-county services only. No out of county trips will be provided;
5. The transportation services will be invoiced at the then current rate for Non-Client Transport Fee, as provided under the County's Fee Schedule for Transportation Services;
6. **The organization will be responsible for payment for transportation services provided by MCTS; and any outstanding debts may result in the denial of future requests until payment is made in full.**

F. CANCELLATIONS

Cancellations must be received by MCTS at least 24 hours before a passenger's requested appointment time to avoid a No-Show charge.

Drivers are not allowed to accept cancellation requests at any time.

2.2 FUNDING SOURCES / TABLES

For the purpose of federally assisted programs, "federal assistance" shall include:

1. grants and loans of Federal funds;
2. the grant or donation of Federal property and interest in property;
3. the detail of Federal personnel;
4. the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
5. any Federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

Each FTA Formula Grant received by our system during the past year, and whether the funds were received through NCDOT or directly from FTA, is checked below. Additional details are provided on how often each of the grants is received (*annually, first time, etc.*) and the amount.

Grant Title	NCDOT	FTA	Details (i.e., purpose, frequency, and duration of receipt)
5310 (Transportation for Elderly Persons and Persons with Disabilities)	<input type="checkbox"/>	<input type="checkbox"/>	
5311 (Formula Grants for Other than Urbanized Areas)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Annually
5311 (b)(3) (Rural Transit Assistance)	<input type="checkbox"/>	<input type="checkbox"/>	
Other: ROAP	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Annually

2.6 CHANGE OF TITLE VI COORDINATOR AND/OR CHAIR-BOARD OF COMMISSIONERS

If Title VI Coordinator or Chair-Board of Commissioners changes, this document and all other documents that name the Coordinator will immediately be updated, and an updated policy statement and assurance will be signed by the new Board of Commissioners Chair.

2.7 ORGANIZATIONAL CHART

An organizational chart showing the Title VI Coordinator's place within the organization is located in **Appendix B**.

2.8 SUBRECIPIENTS

Moore County Transportation Services does not pass-through funds to any other organizations and, therefore, does not have any subrecipients.

3.0 TITLE VI NONDISCRIMINATION POLICY STATEMENT

It is the policy of Moore County Transportation Services (MCTS), as a federal-aid recipient, to ensure that no person shall, on the ground of **race, color, national origin, sex, creed (religion), age or disability**, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs and activities, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all other related nondiscrimination laws and requirements.

Signature



Frank Quis

Board of Commissioners Chair



Date

2.3 MOORE COUNTY TRANSPORTATION SERVICES STAFF

- Transportation Director
- Transportation Administrative Officer II
- Transportation Fleet & Route Coordinator
- Transportation Office Coordinator
- 10 Full Time Drivers and 1 Part Time Driver

2.4 DECISION-MAKING PROCESS

The Moore County Board of Commissioners (BOC) is the governing board for Moore County Transportation Services and makes the final decisions on adopting program documents. The five members on the board vote at one of the one or two monthly meetings on the first Tuesday or Third Tuesday of the month. Permission is granted to be on the agenda. Various Plans/Policies/documents are required to be adopted by the Board of Commissioners. Moore County Transportation Services Local Coordinated Plan (LCP) must be approved every four years, the Substance Abuse Policy (amended as needed), System Safety Program Plan (SSPP) yearly, Title VI Plan amended as needed or every 3 years. The Board of Commissioners approves by vote. A Resolution granting permission for Moore County Transportation Services to apply and receive the annual CTP funds must be passed by the BOC.

Any documents that do not need the commissioners' approval will be brought before the Moore County Transportation Services Advisory Board (TAB) at a quarterly meeting held on the third Wednesday at 3:00 pm. Members of the Advisory Board are appointed by the Board of Commissioners and serve a three-year term. The Board of Commissioners and TAB must approve any rate changes.

Board or Committee Name	Appointed	Elected	# of Members
Board of Commissioners	<input type="checkbox"/>	<input checked="" type="checkbox"/>	5
Transit Advisory Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12

2.5 TITLE VI COORDINATOR

The individual below has been designated as the Title VI Coordinator for Moore County Transportation Services, and is empowered with sufficient authority and responsibility to implement the Title VI Nondiscrimination Program:

Sonia Biggs
Transportation Director
302 Monroe St, Carthage, NC 28327
Phone: 910-947-3389
Email: sbiggs@moorecountync.gov

Key responsibilities of the Coordinator include:

- Maintaining knowledge of Title VI and related requirements.
- Attending civil rights training when offered by NCDOT or any other regulatory agency.
- Administering the Title VI Nondiscrimination Program and coordinating implementation of this Plan.
- Making sure internal staff and officials are familiarized and complying with their Title VI nondiscrimination obligations.
- Disseminating Title VI information internally and to the general public, including in languages other than English.
- Presenting Title VI-related information to decision-making bodies for input and approval.
- Ensuring Title VI-related posters are prominently and publicly displayed.
- Developing a process to collect data related to race, national origin, sex, age, and disability to ensure minority, low-income, and other underserved groups are included and not discriminated against.
- Ensuring that non-elected boards and committees reflect the service area and minorities are represented.
- Implementing procedures for prompt processing (receiving, logging, investigating and/or forwarding) of discrimination complaints.
- Coordinating with, and providing information to, NCDOT and other regulatory agencies during compliance reviews or complaint investigations.
- Promptly resolving areas of deficiency to ensure compliance with Title VI nondiscrimination requirements.

4.0 TITLE VI AND RELATED AUTHORITIES

Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d) provides that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." The 1987 Civil Rights Restoration Act (P.L. 100-259) clarified and restored the original intent of Title VI by expanding the definition of "programs and activities" to include all programs and activities of federal-aid recipients (such as, Moore County Transportation Services), subrecipients, and contractors, whether such programs and activities are federally assisted or not.

Related nondiscrimination authorities include, but are not limited to: U.S. DOT regulation, 49 CFR part 21, "Nondiscrimination in Federally-assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act"; 49 U.S.C. 5332, "Nondiscrimination (Public Transportation)"; FTA Circular 4702.1B - Title VI Requirements and Guidelines for Federal Transit Administration Recipients; DOT Order 5610.2a, "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations"; FTA C 4703.1 - Environmental Justice Policy Guidance For Federal Transit Administration Recipients; Policy Guidance Concerning (DOT) Recipient's Responsibilities to Limited English Proficient (LEP) Persons, 74 FR 74087; The Americans with Disabilities Act of 1990, as amended, P.L. 101-336; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 790; Age Discrimination Act of 1975, as amended 42 U.S.C. 6101; Title IX of the Education Amendments of 1972, 20 U.S.C. 1681; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. 4601; Section 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794d.

4.0 Implementation

- This statement will be signed by the head of Moore County Transportation Services/County of Moore, and re-signed whenever a new person assumes that position.
- The signed statement will be posted on office bulletin boards, near the receptionist's desk, in meeting rooms, inside vehicles, and disseminated within brochures and other written materials.
- The core of the statement (signature excluded) will circulate internally within annual acknowledgement forms.
- The statement will be posted or provided in languages other than English, when appropriate.

5.0 NOTICE OF NONDISCRIMINATION

- Moore County Transportation Services operates its programs and services without regard to **race, color, national origin, sex, creed (religion), age and disability** in accordance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and related statutes. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with Moore County Transportation Services.
- For more information on Moore County Transportations' civil rights program, and the procedures to file a complaint, contact (910)947-3389, (TTY-800-735-2962); email sbiggs@moorecountync.gov or contact our administrative office: Sonia Biggs, Transportation Director; 302 Monroe St; Carthage, NC 28327. For more information, visit www.moorecountync.gov.
- If information is needed in another language, please contact (910) 947-3389.
- A complainant may file a complaint directly with the North Carolina Department of Transportation by filing with the Office of Equal Opportunity and Workforce Services, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511, Attention: Title VI Nondiscrimination Program; phone: 919-508-1808 or 800-522-0453, or TDD/TTY: 800-735-2962.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

5.0 Implementation

- The notice will be posted in its entirety on our website and in any documents and reports we distribute.
- Ads in newspapers and other publications shall include the first three (3) bullets from Section 4.0 listed above.
- The statement will be posted or provided in languages other than English, when appropriate.

6.0 PROCEDURES TO ENSURE NONDISCRIMINATORY ADMINISTRATION OF PROGRAMS AND SERVICES

We are committed to the nondiscriminatory administration of our programs and services. As with the implementation of our programs in general, organization-wide compliance is required. Thus, employees and staff will periodically be reminded of our Title VI nondiscrimination obligations through staff training and use of the **Annual Education and Acknowledgment Form**. The Title VI Coordinator will periodically assess program operations to ensure that this policy is being followed. A single copy of the form is located in Appendix C.

6.0 Implementation

- Periodically, but not more than once a year, employees and representatives will receive, review and certify commitment to the Title VI Program.
- New employees shall be informed of Title VI provisions and expectations to perform their duties accordingly, asked to review the Title VI Program, and required to sign the acknowledgement form.
- Periodic review of operational practices and guidelines by the Title VI Coordinator to verify compliance with the Title VI Program.
- Signed acknowledgement forms and records of internal assessments will remain on file for at least three years.

7.0 CONTRACT ADMINISTRATION

Moore County Transportation Services ensures all contractors will fulfill their contracts in a nondiscriminatory manner. While contractors are not required to prepare a Title VI Program, they must comply with the nondiscrimination requirements of the organization to which they are contracted. Moore County Transportation Services and its contractors will not discriminate in the selection and retention of contractors (at any level) or discriminate in employment practices in connection with any of our projects.

7.1 CONTRACT LANGUAGE

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

(1) **Compliance with Regulations:** The contractor shall comply with the Regulation relative to nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

(2) **Nondiscrimination:** The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, sex, creed, age, or disability in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

(3) **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.

(4) **Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by Moore County Transportation Services or the North Carolina Department of Transportation (NCDOT), the Federal Highway Administration (FHWA) and/or Federal Transit Administration (FTA) to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to Moore County Transportation Services, or the NCDOT, FHWA and/or FTA as appropriate, and shall set forth what efforts it has made to obtain the information.

(5) **Sanctions for Noncompliance:** In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, Moore County Transportation Services shall impose such contract sanctions as it or the NCDOT, FHWA and/or FTA may determine to be appropriate, including, but not limited to:

- (a) withholding of payments to the contractor under the contract until the contractor complies, and/or
- (b) cancellation, termination, or suspension of the contract, in whole or in part.

(6) **Incorporation of Provisions:** The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as Moore County Transportation Services or the NCDOT, FHWA and/or FTA may direct as a means of enforcing such provisions including sanctions for noncompliance: Provided, however, that, in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request Moore County Transportation Services to enter into such litigation to protect the interests of Moore County Transportation Services, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

*The Contractor has read and is familiar with the terms above:

Initials

Date

7.1 Implementation

- The nondiscrimination language above (with initials line) will be appended to any existing contracts, purchase orders, and agreements that do not include it, and initialed by the responsible official of the other organization.
- The nondiscrimination language above (without initials line) will be incorporated as standard language before the signature page of our standard contracts, purchase orders, and agreements.
- The Title VI Coordinator will review existing contracts to ensure the language has been added.

7.2 NONDISCRIMINATION NOTICE TO PROSPECTIVE BIDDERS

The Moore County Transportation Services, in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities, and Title 49 Code of Federal Regulations, Parts 21 and 26, hereby notifies all bidders that it will affirmatively insure that in any contact entered into pursuant to this advertisement, minority and women business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award.

7.2 Implementation

- The nondiscrimination language above will be included in all solicitations for bids for work or material and proposals for negotiated agreements to assure interested firms that we provide equal opportunity and do not discriminate.
- Outreach efforts will be made to minority and women-owned firms that work in requested fields, and documented.
- Unless specifically required under Disadvantaged Business Enterprise (DBE) or Affirmative Action programs, all contractors will be selected without regard to their race, color, national origin, or sex.

8.0 EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

These discrimination complaint procedures describe the process used by Moore County Transportation Services (MCTS) to process and investigate complaints of alleged discrimination filed under Title VI of the Civil Rights Act of 1964 and related nondiscrimination laws that are applicable to programs, services, and activities carried out by Moore County Transportation Services.

Complaints will be investigated by the appropriate authority. Upon completion of every investigation, Moore County Transportation Services will inform the complainant of all avenues of appeal. Moore County Transportation Services will make every effort to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the affected parties and Moore County Transportation Services staff may be utilized for resolution.

A. FILING OF COMPLAINTS

1. **Applicability** – The complaint procedures apply to the beneficiaries of Moore County Transportation Services programs, activities, and services, such as the members of the public and any consultants/contractors hired by Moore County Transportation Services.
2. **Eligibility** – Any person or class of persons who believes that he/she has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities based upon race, color, sex, age, national origin, or disability, may file a written complaint with Moore County Transportation Services. The law prohibits intimidation or retaliation of any sort. The complaint may be filed by the affected individual or a representative, and must be in writing.
3. **Time Limits and Filing Options** – A complaint must be filed no later than 180 calendar days after the following:
 - The date of the alleged act of discrimination; or
 - The date when the person(s) became aware of the alleged discrimination; or
 - Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

Complaints may be submitted to the following entities:

- **Moore County Transportation Services:** Sonia Biggs; 302 Monroe St; Carthage, NC 28327; 910-947-3389.
- **North Carolina Department of Transportation,** Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
- **US Department of Transportation,** Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
- **Federal Transit Administration,** Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590
- **Federal Highway Administration,** Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor, E81-314, Washington, DC 20590, 202-366-0693 / 366-0752
- **Federal Highway Administration,** North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
- **Federal Aviation Administration,** Office of Civil Rights, 800 Independence Avenue, SW, Washington, DC 20591, 202-267-3258
- **US Department of Justice,** Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228

4. **Format for Complaints** – Complaints shall be in **writing** and **signed** by the complainant(s) or a representative and include the complainant's name, address, and telephone number. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by telephone or in person will be reduced to writing, may be recorded, and will be provided to the complainant for confirmation or revision before processing. Complaints will be accepted in other languages, including Braille.
5. **Discrimination Complaint Form** – The Discrimination Complaint Form is consistent with the Nondiscrimination Assurance in Group 01.D of the FTA Certifications & Assurances.
6. **Complaint Basis** – Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term "basis" refers to the complainant's membership in a protected group category.

Protected Categories	Definition	Examples	Applicable Statutes and Regulations	
			FHWA	FTA
Race	An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group	Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White	Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; 23 CFR 200	Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; Circular 4702.1B
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.		
National Origin	Place of birth. Citizenship is not a factor. Discrimination based on language or a person's accent is also covered.	Mexican, Cuban, Japanese, Vietnamese, Chinese		
Sex	Gender	Women and Men	1973 Federal-Aid Highway Act	Title IX of the Education Amendments of 1972
Age	Persons of any age	21 year old person	Age Discrimination Act of 1975	
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, alcoholic, para-amputee, epileptic, diabetic, arthritic	Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990	
Creed	Religion.	Muslim, Christian, Hindu, Atheist	49 U.S.C. 5332(b)	

B. COMPLAINT PROCESSING

1. When a Title VI complaint against Moore County Transportation Services is received by Moore County Transportation Services, it will be forwarded to NCDOT for review, after which NCDOT will send a written acknowledgment and a Consent Release form to the complainant within ten (10) business days by registered mail. Any other Title VI complaint received by Moore County Transportation Services will be investigated internally and a written acknowledgement will be sent to the complainant within ten (10) business days by registered mail.
2. **Moore County Transportation Services cannot investigate Title VI complaints filed against itself**, but can investigate ADA complaints against itself. Moore County Transportation Services will consult with the NCDOT External Civil Rights Section to determine the acceptability and jurisdiction of all complaints received. (Note: If NCDOT has jurisdiction, the External Civil Rights Section will be responsible for the remainder of this process. Moore County Transportation Services will record the transfer of responsibility in its complaints log).
3. Additional information will be requested if the complaint is incomplete. The complainant will be provided 15 business days to submit any requested information and the signed Consent Release form. Failure to do so may be considered good cause for a determination of no investigative merit.
4. Upon receipt of the requested information and determination of jurisdiction, Moore County Transportation Services will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation.
5. If the complaint is investigated, the notification shall state the grounds of the Moore County Transportation Services jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.

C. COMPLAINT LOG

When a complaint is received by Moore County Transportation Services, the complaint will be entered into the Discrimination Complaints Log with other pertinent information, and assigned a **Case Number**. (Note: All complaints must be logged).

1. The complaints log will be submitted to the NCDOT's Civil Rights office during Title VI compliance reviews. (Note: NCDOT may also be request the complaints log during pre-grant approval processes).
2. The **Log Year(s)** since the last submittal will be entered (e.g., 2012-2015, 2014-2015, FFY 2015, or 2015) and the complaints log will be signed before submitting the log to NCDOT.
3. When reporting **no complaints**, check the **No Complaints or Lawsuits** box and sign the log.

**MOORE COUNTY TRANSPORTATION SERVICES
DISCRIMINATION COMPLAINT FORM**

Any person who believes that he/she has been subjected to discrimination based upon race, color, creed (religion), sex, age, national origin, or disability may file a written complaint with Moore County Transportation Services, within 180 days after the discrimination occurred.

Last Name:		First Name:		<input type="checkbox"/> Male <input type="checkbox"/> Female	
Mailing Address:			City	State	Zip
Home Telephone:	Work Telephone:	E-mail Address			

Identify the Category of Discrimination:

- ☐ RACE
 ☐ COLOR
 ☐ NATIONAL ORIGIN
 ☐ AGE
☐ CREED (RELIGION)
 ☐ DISABILITY
 ☐ SEX

**NOTE: Title VI bases are race, color, national origin. All other bases are found in the "Nondiscrimination Assurance" of the FTA Certifications & Assurances.*

Identify the Race of the Complainant

- ☐ Black
 ☐ White
 ☐ Hispanic
 ☐ Asian American
☐ American Indian
 ☐ Alaskan Native
 ☐ Pacific Islander
 ☐ Other _____

Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.

Names of individuals responsible for the discriminatory action(s):

How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. **(Attach additional page(s), if necessary).**

The law prohibits intimidation or **retaliation** against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).

<u>Name</u>	<u>Address</u>	<u>Telephone</u>
1. _____	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____

**MOORE COUNTY TRANSPORTATION SERVICES
DISCRIMINATION COMPLAINT FORM**

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

- ☐ NC Department of Transportation _____
- ☐ Federal Transit Administration _____
- ☐ Federal Highway Administration _____
- ☐ US Department of Transportation _____
- ☐ Federal or State Court _____
- ☐ Other _____

Have you discussed the complaint with any Moore County Transportation Services (MCTS) representative? If yes, provide the name, position, and date of discussion.

Please provide any additional information that you believe would assist with an investigation.

Briefly explain what remedy, or action, are you seeking for the alleged discrimination.

****WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.**

COMPLAINANT'S SIGNATURE

DATE

MAIL COMPLAINT FORM TO:

Moore County Transportation Services/County of Moore
Sonia Biggs
Transportation Director
302 Monroe St; Carthage, NC 28327
Phone: 910-947-3389
Email: sbiggs@moorecountync.gov

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐ NCDOT ☐ FTA Date Referred: _____

Log Year(s):

[illegible]

I certify that to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or **no complaints or lawsuits** alleging discrimination, have been filed with or against **Moore County Transportation Services** since the previous Title VI Program submission to NCDOT.

Date _____

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INVESTIGATIVE GUIDANCE

- A. Scope of Investigation** – An investigation should be confined to the issues and facts relevant to the allegations in the complaint, unless evidence shows the need to extend the issues.
- B. Developing an Investigative Plan** – It is recommended that the investigator prepares an Investigative Plan (IP) to define the issues and lay out the blueprint to complete the investigation. The IP should follow the outline below:
1. Complainant(s) Name and Address (Attorney name and address if applicable)
 2. Respondent(s) Name and Address (Attorney for the Respondent(s) name and address)
 3. Applicable Law(s)
 4. Basis/(es)
 5. Allegation(s)/Issue(s)
 6. Background
 7. Name of Persons to be interviewed
 - a. Questions for the complainant(s)
 - b. Questions for the respondent(s)
 - c. Questions for witness(es)
 8. Evidence to be obtained during the investigation
 - a. Issue – Complainant allege that there are only six African American contractors participating in the highway construction industry in the State and their contract awards are very small.
 - i. Documents needed: documents which show all DBE firms which currently have contracts and must include the following 1) name and race of DBE firm; 2) Date of initial certification into the DBE program; 3) type of business; 4) contracts awarded anytime during the period to the present; 5) dollar value of contract.
- C. Request for Information** – The investigator should gather data and information pertinent to the issues raised in the complaint.
- D. Interviews** – Interviews should be conducted with the complainant, respondent, and appropriate witnesses during the investigative process. Interviews are conducted to gain a better understanding of the situation outlined in the complaint of discrimination. The main objective during the interview is to obtain information that will either support or refute the allegations.
- E. Developing an Investigative Report** – The investigator should prepare an investigative report setting forth all relevant facts obtained during the investigation. The report should include a finding for each issue. A sample investigative report is provided below.

**MOORE COUNTY TRANSPORTATION
Investigative Report**

- I. COMPLAINANT(S) NAME** (or attorney for the complainant(s) – name and address if applicable
Name, Address, Phone: 999-999-9999
- II. RESPONDENT(S)** (or attorney for the respondent(s) – name and address if applicable
Name, Address, Phone: 999-999-9999
- III. APPLICABLE LAW/REGULATION**
- IV. COMPLAINT BASIS/(ES)**
- V. ISSUES/ALLEGATIONS**
- VI. BACKGROUND**
- VII. INVESTIGATIVE PROCEDURE**
- VIII. ISSUES / FINDINGS OF FACT**
- IX. CONCLUSION**
- X. RECOMMENDED ACTIONS**

APPENDIX

[Include in the Appendix any supplemental materials that support your findings and conclusion.]

9.0 SERVICE AREA POPULATION CHARACTERISTICS

To ensure that Title VI reporting requirements are met, Moore County Transportation Services will collect and maintain population data on potential and actual beneficiaries of our programs and services. This section is intended as a compilation of relevant population characteristics from our overall service area. This data will provide context to the Title VI Nondiscrimination Program and be used to ensure nondiscrimination and improve public outreach initiatives and delivery of ongoing programs.

9.1 RACE AND ETHNICITY

The following table was completed using data from Census Table DP05, Demographic and Housing Estimates: 2020:

Race and Ethnicity	Number	Percent
Total Population	99,263	100
White	80,195	80.8
Black or African American	10,994	11.1
American Indian or Alaska Native	782	0.8
Asian	1,358	1.4
Native Hawaiian and Other Pacific Islander	236	0.2
Some other Race	2,209	2.2
Two or More Races	3,489	3.5
HISPANIC OR LATINO (of any race)	6,848	6.9

9.2 AGE & SEX

The following table was completed using data from Census Tables DP05 and S0101, Demographic and Housing Estimates: 2020:

Age	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	99,263	47,786	51,477	100	48.1	51.9
Under 5 years	5,784	N/A	N/A	5.8	N/A	N/A
Under 18 years	21,180	N/A	N/A	21.3	N/A	N/A
18 years and over	78,083	N/A	N/A	78.7	47.4	52.6
65 years and over	23,951	10,613	13,338	24.1	44.3	55.7
Median Age	44.1	N/A	N/A			

9.3 DISABILITY

The following table was completed using data from Census Table S1810, Disability Characteristics: 2020:

Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error \pm	Estimate	Margin of Error \pm	Estimate	Margin of Error \pm
Total civilian noninstitutionalized population	95,272	± 473	14,682	$\pm 1,006$	15.4%	± 1.1
Population under 5 years	5,784	± 86	82	± 84	1.4%	± 1.5
Population 5 to 17 years	15,367	± 87	1,114	± 272	7.2%	± 1.8
Population 18 to 34 years	16,137	± 351	1,312	± 311	8.1%	± 1.9
Population 35 to 64 years	34,956	± 341	4,811	± 604	13.8%	± 1.7
Population 65 to 74 years	12,535	± 175	2,712	± 395	21.6%	± 3.1
Population 75 years and over	10,493	± 194	4,651	± 398	44.3%	± 3.8
SEX						
Male	44,768	± 420	7,026	± 601	15.7%	± 1.3
Female	50,504	± 255	7,656	± 717	15.2%	± 1.4
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	76,721	± 708	11,657	918	15.2%	± 1.2
Black or African American alone	10,570	± 526	2,369	459	22.4%	± 4.2
American Indian and Alaska Native	750	± 176	165	± 70	22.0%	± 8.6
Asian	1,357	± 189	62	± 43	4.6%	± 3.1
Native Hawaiian and Other Pacific Islander	236	± 162	22	± 36	9.3%	± 13.8
Some other Race	2,208	± 643	106	± 68	4.8%	± 3.0
Two or more races	3,430	± 606	301	± 146	8.8%	± 3.8
Hispanic or Latino (of any race)	6,717	± 89	739	± 251	11.0%	± 3.7

9.4 POVERTY

The following table was completed using data from Census Table S1701, Poverty Status in the Past 12 Months: 2020:

Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error \pm	Estimate	Margin of Error \pm	Estimate	Margin of Error \pm
Population for whom poverty status is determined	97,546	± 479	10,260	$\pm 1,249$	10.5%	± 1.3
AGE						
Under 18 years	20,483	± 381	3,071	± 647	15.0%	± 3.2
18 to 64 years	54,035	± 167	5,659	± 729	10.5%	± 1.3
65 years and over	23,028	± 294	1,530	± 267	6.6%	± 1.2
SEX						
Male	47,030	± 290	4,188	± 536	8.9%	± 1.1
Female	50,516	± 318	6,072	± 901	12.0%	± 1.8
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	79,319	± 595	6,498	$\pm 1,030$	8.2%	± 1.3
Black or African American alone	10,686	± 498	2,747	± 805	25.7%	± 7.5
American Indian and Alaska Native	750	± 176	93	± 79	12.4%	± 11.1
Asian	1,357	± 189	94	± 106	6.9%	± 7.7
Native Hawaiian and Other Pacific Islander	236	± 162	0	± 31	0.0%	± 15.5
Some other Race	2,002	± 635	151	± 101	7.5%	± 5.6
Two or more races	3,196	± 673	677	± 315	21.2%	± 8.7
Hispanic or Latino origin (of any race)	6,769	± 147	1,660	± 501	24.5%	± 7.3
All individuals below:						
50 percent of poverty level	3,965	± 865	-	-	-	-
125 percent of poverty level	13,874	$\pm 1,399$	-	-	-	-
150 percent of poverty level	17,798	$\pm 1,505$	-	-	-	-
185 percent of poverty level	22,711	$\pm 1,512$	-	-	-	-
200 percent of poverty level	25,556	$\pm 1,681$	-	-	-	-
300 percent of poverty level	42,769	$\pm 1,805$	-	-	-	-
400 percent of poverty level	57,895	$\pm 1,743$	-	-	-	-
500 percent of poverty level	69,674	$\pm 1,760$	-	-	-	-

9.5 HOUSEHOLD INCOME

The following table was completed using data from Census Table S1901, Income in the Past 12 Months (In 2020 Inflation-Adjusted Dollars): 2020:

Subject	Households	
	Estimate	Margin of Error \pm
Total	40,575	± 749
Less than \$10,000	4.7%	± 0.9
\$10,000 to \$14,999	4.5%	± 0.8
\$15,000 to \$24,999	8.7%	± 1.0
\$25,000 to \$34,999	9.2%	± 1.2
\$35,000 to \$49,999	12.1%	± 1.4
\$50,000 to \$74,999	17.2%	± 1.5
\$75,000 to \$99,999	15.2%	± 1.7
\$100,000 to \$149,999	15.7%	± 1.3
\$150,000 to \$199,999	5.1%	± 0.7
\$200,000 or more	7.5%	± 1.0
Median income (dollars)	86,394	$\pm 3,676$
Mean income (dollars)	40,575	± 749

9.6 LIMITED ENGLISH PROFICIENCY POPULATIONS

The following table was completed using data from Census Table B16001, 2015:

	Moore County, North Carolina	
	Estimate	Margin of Error
Total:	86,714	± 106
Speak only English	80,341	± 619
Spanish or Spanish Creole:	4,664	± 427
Speak English "very well"	2,747	± 465
Speak English less than "very well"	1,917	± 391

The Spanish or Spanish Creole population is the only group that meets the 5% or 1,000 in population figure. The next largest language groups are German with 271 speakers and Tagalog, with 243 speakers, however both groups overwhelmingly speak English very well and also fall well below the 5% or 1,000 threshold. Of the 271 German speakers, 239 speak English very well while all 243 Tagalog speakers speak English very well. There has not been an issue servicing any of these population groups, and the most likely service needed would be from the ROAP Token program. When situations arise where interpretation is needed, MCTS has resources available throughout the community to assist including bilingual staff, assistance from other county departments including the Department of Social Services and Transportation Advisory Board Members.

9.7 POPULATION LOCATIONS

Federal-aid recipients are required to know the characteristics and locations of populations they serve, particularly by race/ethnicity, poverty and limited English proficiency. This can be accomplished through maps that overlay boundaries and demographic features on specific communities.

10.0 TITLE VI EQUITY ANALYSES (AND ENVIRONMENTAL JUSTICE ASSESSMENTS)

As required under FTA C 4702.1B and 4703.1, Title VI equity and environmental justice (EJ) analyses will be conducted whenever we plan to construct (or modify) a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., or when there will be a change in fares. These studies will be conducted to see if the change could result in either a disparate impact based on race, color or national origin (Title VI) or a disproportionately high and adverse impact to minority and/or low-income populations (EJ). Thus, they will look at various alternatives before selecting a site for the facility. Project-specific demographic data will be collected on potentially affected communities and their involvement in associated decision-making activities will be documented. Specific studies will be made available to oversight agencies during compliance reviews or to evidence our due diligence should a complaint be filed in relation to the location and effect of a proposed facility or fare increases. Project-related equity and EJ studies will remain on file indefinitely.

11.0 PUBLIC INVOLVEMENT

11.1 INTRODUCTION

Effective public involvement is a key element in addressing Title VI in decision-making. Recipients engaged in planning and other decision-making activities must have a documented public participation process that provides adequate notice of public participation activities, and early and continuous opportunities for public review and comment at key decision points. Underlying these efforts is our commitment to determining the most effective outreach methods for a given project or population.

This **Public Participation Plan** describes how Moore County Transportation Services will disseminate vital agency information and engage the public by seeking out and considering the needs and input of interested parties and those traditionally underserved by existing transportation systems, such as minority and limited English proficient persons, who may face challenges accessing programs and other services. General public involvement practices will include:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Employing different meeting sizes and formats.
- Coordinating with community college, community- and faith-based organizations, educational institutions, and other entities to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP persons could also include audio programming available on podcasts.

11.2 PUBLIC NOTIFICATION

Passengers and other interested persons will be informed of their rights under Title VI and related authorities with regard to our program. The primary means of achieving this will be posting and disseminating the policy statement and notice as stipulated in Sections 3.0 and 4.0, respectively. Additional measures may include openly stating our obligations and the public's rights at meetings, placing flyers at places frequented by targeted populations, and an equal opportunity tag-on at the end of radio announcements. The method of notification will be determined through an initial screening of the area.

11.3 DISSEMINATION OF INFORMATION

Information on Title VI and other programs will be crafted and disseminated to employees, contractors and subrecipients, stakeholders, and the general public. Public dissemination efforts may vary depending on factors present, but will generally include: posting public statements setting forth our nondiscrimination policy in eye-catching designs and locations; placing brochures in public places, such as government offices, transit facilities, and libraries; having nondiscrimination language within contracts; including nondiscrimination notices in meeting announcements and handouts; and displaying our Notice of Nondiscrimination at all our public meetings.

At a minimum, nondiscrimination information will be disseminated on our website and on posters in conspicuous areas at our office(s). Project-related information and our most current Title VI-related information will be maintained online.

11.4 MEETINGS AND OUTREACH

There is no one-size-fits-all approach to public involvement. A variety of comprehensive and targeted public participation methods will be used to facilitate meaningful public involvement. Methods for engaging stakeholders and target audiences, including traditionally underserved and excluded populations (i.e., minorities, youth, low-income, the disabled, etc.) will include the following:

A. PUBLIC RELATIONS AND OUTREACH

Public relations and outreach (PRO) strategies aim to conduct well-planned, inclusive and meaningful public participation events that foster good relations and mutual trust through shared decision-making with the communities we serve.

- We will seek out and facilitate the involvement of those potentially affected.
- Public events will aim to be collaborative, fun, and educational for all, rather than confrontational and prescriptive.
- Media plans will typically involve multiple channels of communication like mailings, radio, TV, and newspaper ads.
- Abstract objectives will be avoided in meeting announcements. Specific “attention-grabbing” reasons to attend will be used, such as “Help us figure out how to relieve congestion on [corridor name]” or “How much should it cost to ride the bus? Let us know on [date].”
- Efforts will be made to show how the input of participants can, or did, influence final decisions.
- We will do our best to form decision-making committees that look like and relate to the populations we serve.
- We will seek out and identify community contacts and partner with local community- and faith-based organizations that can represent, and help us disseminate information to, target constituencies.
- Demographic data will be requested during public meetings, surveys, and from community contacts and committee members.

B. PUBLIC MEETINGS

“Public meeting” refers to any meeting open to the public, such as hearings, charrettes, open house and board meetings.

- Public meetings will be conducted at times, locations, and facilities that are convenient and accessible.
- Meeting materials will be available in a variety of predetermined formats to serve diverse audiences.
- An assortment of advertising means may be employed to inform the community of public meetings.
- Assistance to persons with disabilities or limited English proficiency will be provided, as required.

C. SMALL GROUP MEETINGS

A small group meeting is a targeted measure where a meeting is held with a specific group, usually at their request or consent. These are often closed meetings, as they will typically occur on private property at the owner's request.

- If it is determined that a targeted group has not been afforded adequate opportunities to participate, the group will be contacted to inquire about possible participation methods, including a group meeting with them individually.
- Unless unusual circumstances or safety concerns exist, hold the meeting at a location of the target group's choosing.
- Share facilitation duties or relinquish them to members of the target group.
- Small group discussion formats may be integrated into larger group public meetings and workshops. When this occurs, the smaller groups will be as diverse as the participants in the room.

D. COMMUNITY SURVEYING

- Opinion surveys will occasionally be used to obtain input from targeted groups or the general public on their transportation needs, the quality or costs of our services, and feedback on our public outreach efforts.
- Surveys may be conducted via telephone, door-to-door canvassing, at community fairs, by placing drop boxes in ideal locations, or with assistance from other local agencies, like social services.

11.5 LIMITED ENGLISH PROFICIENCY

Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

In an effort to comply with DOT's LEP policy guidance and Executive Order 13166, this section of our public participation plan outlines the steps we will take to ensure meaningful access to all benefits, services, information, and other important portions of our programs and activities by individuals who are limited-English proficient. Accordingly, a four factor analysis was conducted to determine the specific language services appropriate to provide, and to whom, to inform language assistance planning and determine if our communication with LEP persons is effective.

A. FOUR FACTOR ANALYSIS

This Four Factor Analysis is an individualized assessment that balances the following four factors:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;
- (2) The frequency with which LEP individuals come in contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
- (4) The resources available to the recipient and costs.

Factor #1: *The number or proportion of LEP persons eligible to be served or likely to be encountered by the program, activity, or service of the recipient.*

LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	86714	± 106	100%	(X)
Speak only English	80341	± 619	%	± %
Spanish or Spanish Creole:	4,664	± 427	%	± %
Speak English "very well"	2,747	± 465	%	± %
Speak English less than "very well"	1,917	± 391	%	± %

Moore County Transportation Services reviewed the 2015 US Census estimates from a population of 86,714 with Spanish or Spanish Creole individuals comprising the largest non-English speaking language group. The language spoken most by this group of individuals is Spanish. The Census Bureau estimates that there are 1,917

of those individuals that speak English less than “very well”. This information helps Moore County Transportation understand that we are above the Safe Harbor Threshold for the Spanish and Creole population. Therefore it is our responsibility to also provide vital documents such as complaint sheets, policy statement and the Notice to the Public in Spanish. We will also assess through a survey if the LEP individuals are underserved due to language barriers.

Factor #2: The frequency with which LEP individuals come in contact with the program.

Although the census shows that Moore County has a LEP population above the Safe Harbor Threshold it is very rare that Moore County Transportation Services has the opportunity to come in contact with these individuals. However, if we are contacted by an LEP individual we keep a log and have the resources available to properly assist. To verify that MCTS is meeting the needs of the non-English speaking population, surveys will be conducted via public meetings, ridership, contractors, local agencies and the faith community annually by distributing a simple survey card with two questions in English and the language the transit system finds necessary for their LEP group that would be more adequate for this assessment:

- What purpose do you often use our services? (Give a few examples to check mark, employment, medical, etc.)
- How often a week are you using our services?

Factor #3: The nature and importance of the program, activity, or service provided by the recipient to people's lives.

Moore County Transportation feels that public outreach to all groups within the community is important and will continue to reach out to persons with limited English proficiencies. Moore County Transportation provides all citizens including LEP client's non-emergency, subscription, demand response service and deviated fixed route operation to all Moore County residents. These transit services are for general public ridership or those sponsored through agency contracts with the Department of Social Services, Moore County Department of Aging, Monarch and other human service agencies within Moore County. The primary mission of Moore County Transportation Services is to provide safe and efficient transportation. Providing this service allows citizens to stay mobile and keep their independence. Using surveys for your riders will provide you the proper evidence of your transit system's significance to the community. On the same card as previously mentioned you could ask two more questions:

- Is “your transit system's name” transportation services important to you?
- If so which one? (Give examples to check mark)
- What is your primary language?

Factor #4: The resources available to the recipient and costs.

Moore County Transportation Services identified local resources that could be used to provide LEP assistance to customers. Latino/Hispanic staff working within Moore County Government and free language services such as google translator which could be used to provide translation and interpreting services. Google translation is installed on the Moore County Transportation/Moore County website.]

B. LANGUAGE ASSISTANCE PLAN

Moore County Transportation Services analyzed the four factors and determined that the population of LEP persons living in Moore County that speak Spanish warrants the need for special population outreach to assist individuals with Limited English Proficiency with its service region. The Spanish speaking population meets the safe harbor threshold for the need of translation services listed above.

1. Language Assistance Measures

The following general language assistance measures are reasonable and achievable for our organization at this time:

- Translating public notices posted in the local paper, stops, and in vehicles into the languages of all language groups that met the threshold in Factor 1.
- Making a concerted effort to inform LEP persons of available language assistance via staff, broadcast media, relationship-building with organizations, and our website.
- Posting vital bulletin board information and disseminating community surveys in various languages.
- Providing translation and interpretive services when appropriate (upon request or predetermined) at meetings.
- Determining how best to take public involvement to LEP groups directly, including through small group meetings.
- Language line translation services at our call center.
- Utilizing or hiring staff that speak a language other than English and can provide competent language assistance. Note: We will not ask community-based organizations to provide, or serve as, interpreters at our meetings. Relying upon CBOs in that capacity could raise ethics concerns. If a CBO decides (on its own) to translate any materials for its constituents, or bring interpreters it trusts to our meetings, we cannot object. That is their right.
- Using language identification flashcards to determine appropriate services.
- Establishing a process to obtain feedback on our language assistance measures.

a. Specific Measures by Language Group

- Spanish: MCTS will provide the following: Brochures and flyers, etc. in Spanish since that has been found to be the most dominant 2nd language.

2. Written Translation and Oral Interpretation

Vital documents will be translated for each eligible LEP language group in our service area that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be encountered. Translated materials will be placed online and in appropriate public (or private) places accessible to LEP persons. The safe harbor provisions apply to the translation of written documents only, and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. When appropriate, translation of any document will be communicated orally in the appropriate language.

In the event that the 5% trigger is reached for a LEP language group that is fewer than 50 persons, written notice will be provided in the primary language of that group of the right to receive competent oral interpretation of vital written materials, free of cost. The most effective method of notice, which could be an ad in the local newspaper or other publication, a radio commercial, or door hangers, will be determined in consideration of the circumstances on the ground and in coordination with language access resource contacts (LARCs).

3. Staff Support for Language Assistance

- Moore County Transportation staff will be provided a list of referral resources that can assist LEP persons with written translation and oral interpretation, including the Title VI Officer and any outside consultant contracted to provide language services. This list will be updated as needed to remain current.
- All main offices and vehicles will have on hand a supply of language assistance flashcards and materials translated into the languages of the largest LEP language groups. When encountered by an LEP person, staff (including drivers) should present the individual with a flashcard and let them choose the language. Do not assume you know their preferred language. Drivers are permitted to seek volunteer assistance from other passengers before contacting a referral resource. Document the encounter and report it to the Title VI Coordinator.

- **Training:** All employees will be instructed on our procedures for providing timely and reasonable assistance to LEP persons. New employee orientation will also explain these procedures to new hires. Staff routinely encountering LEP persons by telephone or in person will receive annual refresher training. All other employees will be reminded of LEP through annual Title VI program acknowledgements (Section 5.0) and basic Title VI trainings (Section 11.0).

4. Project-Specific LEP Outreach

A project-specific four factor analysis will be conducted for any project being planned or scheduled outreach event limited to a specific geographical area delineated for that activity (i.e., the project study area or outreach area, respectively). Language assistance will be provided in accordance with the measures already outlined, including translating written materials for each LEP language group that is 5% or 1,000, whichever is less, of the project or outreach area population.

5. Monitoring and Updating the LAP

Monitoring of daily interactions with LEP persons will be continuous, thus assistance techniques may be refined at any time. This LAP will be periodically reviewed to determine if our language assistance measures and staff training are working. Resource availability and feedback from agency staff and the general public will be factors in the evaluation and any proposed updates. Among other practices, this process will include working with LEP community contacts to determine if our employees are responding appropriately to requests made with limited English or in languages other than English, and observing how agency staff responds to requests, including observing drivers or surveying riders. To the best of our ability, we will attempt to never eliminate a successful existing LEP service. Significant LEP program revisions will be approved or adopted by our board or designated official and dated accordingly. LEP data and procedures will be reviewed and updated at least once every three years.

11.6 DEMOGRAPHIC REQUEST

The following form was used to collect required data on Key Community Contacts and nonelected committee members. A single copy of the "Demographic Request" form is located in Appendix E.

Moore County Transportation is required by Title VI of the Civil Rights Act of 1964 and related authorities to record demographic information on members of its boards and committees. Please provide the following information:

Race/Ethnicity: <input type="checkbox"/> White <input type="checkbox"/> Black/African American <input type="checkbox"/> Asian <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Native Hawaiian/Pacific Islander <input type="checkbox"/> Hispanic/Latino <input type="checkbox"/> Other (please specify): _____	National Origin: (if born outside the U.S.) <input type="checkbox"/> Mexican <input type="checkbox"/> Central American: _____ <input type="checkbox"/> South American: _____ <input type="checkbox"/> Puerto Rican <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Korean <input type="checkbox"/> Other (please specify): _____
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	Age: <input type="checkbox"/> Less than 18 <input type="checkbox"/> 45-64 <input type="checkbox"/> 18-29 <input type="checkbox"/> 65 and older <input type="checkbox"/> 30-44
Disability: <input type="checkbox"/> Yes <input type="checkbox"/> No	
I choose not to provide any of the information requested above: <input type="checkbox"/>	

Completed forms will remain on file as part of the public record. For more information regarding Title VI or this request, please contact the Moore County Transportation Services/County of Moore at 910-947-3389 or by email at sbiggs@moorecountync.gov

Please sign below acknowledging that you have completed this form.

Thank you for your participation!

Name (print): _____

Signature: _____

11.6 Implementation

- Forms will be completed prior to triennial Title VI compliance reviews and remain on file for three years.
- All new and existing members of appointed decision-making boards or committees will be required to complete this form for reporting purposes.
- If a member, for whatever reason, selects "I choose not to provide any of the information requested above," they will have also completed the form.
- If a member chooses not to provide any of the information on the form, the Title VI Coordinator will be permitted to indicate that member's race and gender, based on the Coordinator's best guess.
- Data from these forms will be used to complete the Demographic Request Table in Appendix E.
- Once a new member submits this form, the Demographic Request Table for the associated committee will be updated.

11.7 KEY COMMUNITY CONTACTS

Contact Name	Community Name	Interest or Affiliation	Also a Committee Member? (Y/N)
Clare Ruggles	Northern Moore Family Resource Ctr.	Community Group	No
O'Linda Watkins-McSurely	NAACP	Community Group	No
Maria Motta	Sandhills Community College	Local Higher Education	Yes
Abigail Bivans	Moore Free & Charitable Clinic	Medical Facility	No

Contact information for key community contacts is not public information and is maintained outside of this document. Any staff member who wishes to contact anyone listed above must request that information from the Title VI Coordinator.

11.8 SUMMARY OF OUTREACH EFFORTS MADE SINCE THE LAST TITLE VI PROGRAM SUBMISSION

The following format will be used to report all outreach efforts made since our last NCDOT Title VI Compliance Review. All meetings and disseminations of information shall enable collection of information for the table below:

Meeting Date	Meeting Time	Meeting Purpose	Target Audience	Information Disseminated
January 5, 2022	-	Make students aware of transportation options	Students	Flyers
March 24, April 28, May 26, August 25, 2022	10:00 am	Discuss Opioid crisis in the region and inform the group on how MCTS can be of assistance	Opioid clients needing clinic transportation	Verbal information on system information and how coordination can be done
April 13, 2022	1:00 pm	Discuss transportation options	Seniors	Flyers and Verbal presentation on Demand Response and A-Pines Line

12.0 STAFF TRAINING

All employees will receive basic Title VI training at least once every three years. New hires will receive this training within 15 days of their start date. Basic training will cover all sections of this Plan and our overall Title VI obligations. Staff may receive specialized training on the application of Title VI in their specific work areas. Those who routinely encounter the public, such as office personnel, call center staff, and vehicle drivers, will receive annual refresher training. Trainings will be provided or organized by the Title VI Coordinator, and will often coincide with updates to our nondiscrimination policies and procedures. Records of staff trainings will be on file for at least three years (and in personnel files), and will include agendas, sign-in sheets, copies of calendars, and any certificates issued.

13.0 NONELECTED BOARDS AND COMMITTEES – BY RACE AND GENDER

The table below depicts race and gender compositions for each of our nonelected (appointed) decision-making bodies.

Subject	Male %	Female %	Caucasian %	African American %	Asian American %	Native American %	Other %	Hispanic %
Service Area Population	48.1%	51.9%	80.8%	11.1%	1.4%	0.8%	2.2%	6.9%
Transit Advisory Board	45%	55%	82%	9%	0%	0%	0%	9%

A. STRATEGIES FOR REPRESENTATIVE COMMITTEES

We will seek minority participation and strive for committees that are representative of our constituencies by:

- Openly asking public and small group meeting participants if they would be interested in serving on a committee.
- Seeking referrals from local organizations and key community contacts that serve or represent minorities.
- Exploring different types of committees, such as ad hoc minority- or youth-only Citizen Advisory Committees.
- Outreach efforts and responses (or lack thereof from those asked to serve or refer others) will be documented.

14.0 RECORD-KEEPING AND REPORTS

Records will be kept to document compliance with the requirements of the Title VI Program. Unless otherwise specified, Title VI-related records shall be retained indefinitely. These records will be made available for inspection by authorized officials of the NCDOT and/or FTA. As a sub-recipient of FTA funds through NCDOT, we are required to submit a Title VI Program update to NCDOT every three years, the next of which is due in 2020. Reports on Title VI-related activities and progress to address findings identified in civil rights compliance reviews and assessments may also be submitted on an as-requested basis. It will occasionally be necessary to update this program plan and its component parts (e.g., complaints, Public Involvement, and LEP), applicable documents, and responsible officials. Updates will be submitted to NCDOT for review and approval.

In addition to other items throughout this plan, records and reports due at the time of compliance reviews or investigations will include:

Compliance Reviews	Complaint Investigations
<ul style="list-style-type: none">▪ Title VI Program Plan▪ List of civil rights trainings provided or received▪ Summaries from any <i>internal</i> reviews conducted▪ Ads and notices for specific meetings▪ Findings from reviews by any other <i>external</i> agencies▪ Title VI equity analyses and EJ assessments▪ Discrimination Complaints Log	<ul style="list-style-type: none">▪ Investigative Reports▪ Discrimination complaint, as filed▪ List of interviewees (names and affiliations)▪ Supporting Documentation (e.g., requested items, photos taken, dates and methods of contact, etc.)

Annually: Community Transportation Grant-Title VI Program Report

Quarterly: Public Outreach

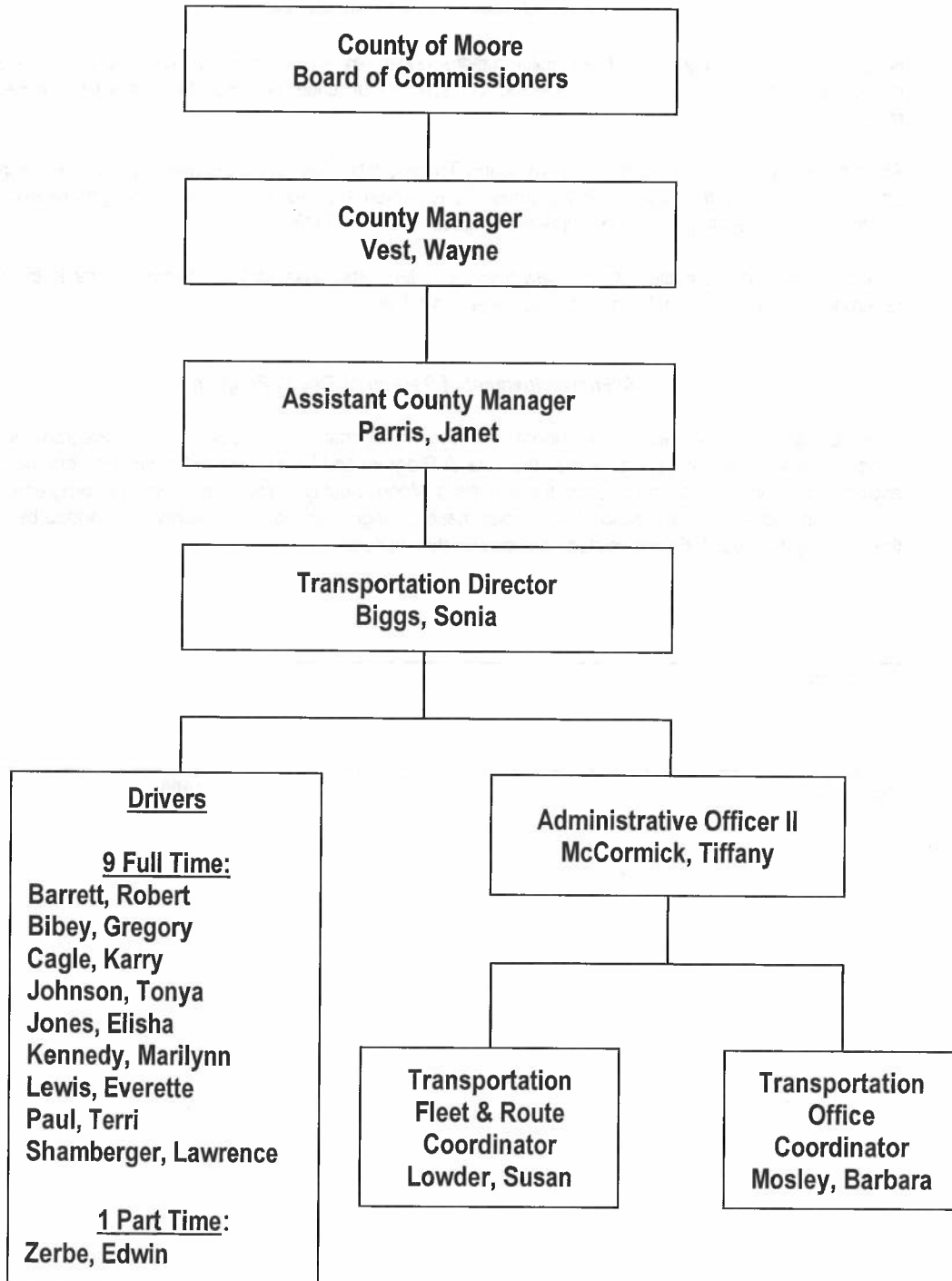
Appendix A Applicable Nondiscrimination Authorities

During the implementation of this Title VI Program, the organization, for itself, its assignees and successors in interest, is reminded that it has agreed to comply with the following non-discrimination statutes and authorities, including but not limited to:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).
- Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e *et seq.*, Pub. L. 88-352), (prohibits employment discrimination on the basis of race, color, creed, sex, or national origin);
- 49 CFR Part 26, regulation to ensure nondiscrimination in the award and administration of DOT-assisted contracts in the Department's highway, transit, and airport financial assistance programs;
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Airport and Airway Improvement Act of 1982, (49 USC § 4 71, Section 4 7123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex).

Appendix B

Moore County Transportation Organization Chart



Appendix C

Annual Education and Acknowledgement Form

Title VI Nondiscrimination Policy *(Title VI and related nondiscrimination authorities)*

No person shall, on the grounds of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of a Federal-aid recipient.

All employees and representatives of Moore County Transportation Services are expected to consider, respect, and observe this policy in their daily work and duties. If any person approaches you with a civil rights-related question or complaint, please direct him or her to Sonia Biggs at (910) 947-3389.

In all dealings with the public, use courtesy titles (e.g., Mr., Mrs., Miss, Dr.) to address or refer to them without regard to their race, color, national origin, sex, age or disability.

Acknowledgement of Receipt of Title VI Program

I hereby acknowledge receipt of Moore County Transportation Services Title VI Program and other nondiscrimination guidelines. I have read the Title VI Program and I am committed to ensuring that no person is excluded from participation in or denied the benefits of Moore County Transportation Services programs, policies, services and activities on the basis of race, color, national origin, sex, age, or disability, as provided by Title VI of the Civil Rights Act of 1964 and related nondiscrimination statutes.

Print Name

Signature

Date

Appendix D
NCDOT's Compliance Review Checklist for Transit

I. Program Administration (General Requirements) Requirement: FTA C 4702.1B – Title VI Requirements and Guidelines for FTA Recipients, Chapter III – General Requirements and Guidelines. Note: Every NCDOT subrecipient receiving any of the FTA Formula Grants listed above must complete this section.	
Requested Items (Please attach electronic documents (.pdf, .doc, etc.) or provide links to online versions)	Completed
1. A copy of the recipient's <i>signed</i> NCDOT's Title VI Nondiscrimination Agreement	<input type="checkbox"/>
2. Title VI Policy Statement (<i>signed</i>)	<input type="checkbox"/>
3. Title VI Notice to the Public, including a list of locations where the notice is posted	<input type="checkbox"/>
4. Type the name and title of your Title VI Coordinator and attach a list of their Title VI duties Name/Title: Sonia Biggs, Transportation Director	<input type="checkbox"/>
5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)	<input type="checkbox"/>
6. Title VI Complaint Form	<input type="checkbox"/>
7. List of transit-related Title VI investigations, complaints, and lawsuits (i.e., discrimination complaints log)	<input type="checkbox"/>
8. Public Participation Plan, including information about outreach methods to engage traditionally underserved constituencies (e.g., minorities, limited English proficient populations (LEP), low-income, disabled), as well as a summary of outreach efforts made since the last Title VI Program submission	<input type="checkbox"/>
9. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance, which requires conducting four-factor analyses	<input type="checkbox"/>
10. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees	<input type="checkbox"/>
11. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program	<input type="checkbox"/>
12. A description of the procedures the agency uses to ensure nondiscriminatory administration of programs and services	<input type="checkbox"/>
13. If you pass through FTA funds to other organizations , include a description of how you monitor your subrecipients for compliance with Title VI, and a schedule for your subrecipients' Title VI Program submissions. ➤ No Subrecipients <input type="checkbox"/>	<input type="checkbox"/>
14. A Title VI equity analysis if you have constructed or conducted planning for a facility , such as a vehicle storage facility, maintenance facility, operation center, etc. ➤ No Facilities Planned or Constructed <input type="checkbox"/>	<input type="checkbox"/>
15. Copies of environmental justice assessments conducted for any construction projects during the past three years and, if needed based on the results, a description of the program or other measures used or planned to mitigate any identified adverse impact on the minority or low-income communities ➤ No Construction Projects <input type="checkbox"/>	<input type="checkbox"/>

16. If the recipient has undergone a Title VI Compliance Review in the last 3 years, please indicate the year of the last review and who conducted it. Year/Agency:	<input type="checkbox"/>
<p>II. Transit Providers</p> <p>Requirement: FTA C 4702.1B, Chapter IV – Requirements and Guidelines for Fixed Route Transit Providers.</p> <p>Note: All NCDOT subrecipients that provide fixed route public transportation services (e.g., local, express or commuter bus; bus rapid transit; commuter rail; passenger ferry) must complete this section.</p> <p>➤ Not Applicable <input checked="" type="checkbox"/> (Check this box if you do not provide fixed route services, and skip questions 17 and 18. This section does not apply to you if you only provide demand response services.)</p>	
Requested Items (Please attach electronic documents (.pdf, .doc, etc.) or provide links to online versions)	Completed
17. Service standards (quantitative measures) developed for <i>each specific fixed route mode</i> that the recipient provides (standards may vary by mode) must be submitted for each of the following indicators:	
<ul style="list-style-type: none"> Vehicle load for each mode (Can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees.) 	<input type="checkbox"/>
<ul style="list-style-type: none"> Vehicle headway for each mode (Measured in minutes (e.g., every 15 minutes), headway refers to the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Service frequency is measured in vehicles per hour (e.g., 4 buses per hour).) 	<input type="checkbox"/>
<ul style="list-style-type: none"> On time performance for each mode (Expressed as a percentage, this is a measure of runs completed as scheduled. The recipient must define what is considered to be "on time." Performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along a route.) 	<input type="checkbox"/>
<ul style="list-style-type: none"> Service availability for each mode (Refers to a general measure of the distribution of routes within a transit provider's service area, such as setting the maximum distance between bus stops or train stations, or requiring that a percentage of all residents in the service area be within a one-quarter mile walk of bus service.) 	<input type="checkbox"/>
18. Service policies (system-wide policies) adopted to ensure that service design and operations practices do not result in discrimination on the basis of race, color or national origin, must be submitted for each of the following:	
<ul style="list-style-type: none"> Transit amenities for each mode (e.g., benches, shelters/canopies, printed materials, escalators/elevators, and waste receptacles. NOTE: Attach this information <u>only</u> if you have decision-making authority over siting transit amenities or you set policies to determine the siting of amenities.) 	<input type="checkbox"/>
<ul style="list-style-type: none"> Vehicle assignment for each mode (Refers to the process by which transit vehicles are placed into service throughout a system. Policies for vehicle assignment may be based on the type or age of the vehicle, where age would be a proxy for condition, or on the type of service offered.) 	<input type="checkbox"/>

Appendix E

DEMOGRAPHIC REQUEST FORM

Moore County Transportation is required by Title VI of the Civil Rights Act of 1964 and related authorities to record demographic information on members of its boards and committees. Please provide the following information:

Race/Ethnicity: <input type="checkbox"/> White <input type="checkbox"/> Black/African American <input type="checkbox"/> Asian <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Native Hawaiian/Pacific Islander <input type="checkbox"/> Hispanic/Latino <input type="checkbox"/> Other (please specify): _____	National Origin: (if born outside the U.S.) <input type="checkbox"/> Mexican <input type="checkbox"/> _____ Central American: <input type="checkbox"/> South American: _____ <input type="checkbox"/> Puerto Rican <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Korean <input type="checkbox"/> Other (please specify): _____
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	Age: <input type="checkbox"/> Less than 18 <input type="checkbox"/> 45-64 <input type="checkbox"/> 18-29 <input type="checkbox"/> 65 and older <input type="checkbox"/> 30-44
Disability: <input type="checkbox"/> Yes <input type="checkbox"/> No	
I choose not to provide any of the information requested above: <input type="checkbox"/>	

Completed forms will remain on file as part of the public record. For more information regarding Title VI or this request, please contact the Moore County Transportation Services/County of Moore at 910-947-3389 or by email at sbiggs@moorecountync.gov.

Please sign below acknowledging that you have completed this form.

Thank you for your participation!

Name (Print): _____

Signature: _____

